

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	DOCKET NUMBER
	§	3:14CR 293-M
	§	
JOHN WILEY PRICE (1)	§	Chief Judge Barbara M. G. Lynn

**DEFENDANT PRICE'S NOTICE OF EXPERT WITNESS**

This Court's pretrial order provides that parties shall designate experts for matters concerning which they have the burden of proof by October 31, 2016.

Although the Defendant does not have the burden to prove that returns were filed, as alleged in Counts 8-11, the Defendant will present expert testimony set forth in Doc. 391 to refute any contention that returns were filed for tax years 2007, 2008, and 2009, as alleged in Counts 8-11. Accordingly, this disclosure is made in an abundance of caution. That expert testimony will be presented by Certified Public Accountant Chris J. Dellinges.

Respectfully submitted,

/s/Shirley Baccus-Lobel

Shirley Baccus-Lobel

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### **CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2016 I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. The electronic case files system sent a "Notice of Electronic Filing" to the following individuals who have consented in writing to accept this Notice as service of this document by electronic means: AUSAs Walt Junker, Katherine Miller, and Nick Bunch, 3<sup>rd</sup> Floor, 1100 Commerce, Dallas, Texas 75242; and all other counsel of record.

/s/Shirley Baccus-Lobel

Shirley Baccus-Lobel